



RESPONSE TO 07/30/90 CIL.

0950105001 - Knox  
Gates Rubber Co., the  
Compliance

The Gates Rubber Company  
Galesburg Division  
P.O. Box 1196  
Galesburg, Illinois 61402-1196  
(309) 343-7171

August 8, 1990

Linda Hollinshead  
Compliance Unit  
Planning and Reporting Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

RECEIVED

AUG 10 1990

IEPA-DLPC

Re: Compliance Inquiry Letter  
Certified #P 562 339 247  
July 30, 1990

Dear Linda:

Pursuant to the Compliance Inquiry Letter received from the IEPA, the following steps have been taken to bring this facility into complete compliance with the requirements of 35 Ill. Adm. Code Part 722 and Part 728, and 42 USCA 6930, Section 3010(a).

1. The cooling water sludge container was not covered at the time of inspection as per 35 Ill. Adm Code 725.273(a) (Subpart I).
  - a. The container was uncovered to expedite the drying of the sludge prior to release to the waste carrier.
  - b. The container has since been covered with a tarpaulin as required. The cover is removed when checking the sludge for free liquid and then recovered.
  - c. Corrective action completed as of June 15, 1990.

EPA Region 5 Records Ctr.



325954

2. The cooling water sludge container was not labeled as a hazardous waste as per 35 Ill. Adm Code 722.134 (a)(3).
  - a. The container had been labeled with the required information when the sludge was first placed in the container however, the label was not in place at the time of inspection.
  - b. A new label was completed with the required information and placed on the container.
  - c. Corrective action completed as of June 14, 1990.
3. An amended notification pursuant to 42 USCA 6930, Section 3010(a) for generating or transporting hazardous waste was not submitted as required.
  - a. This was an oversight on our part in not reviewing the original notification and making the necessary revisions as required.
  - b. An amended notification has been completed, signed and submitted to the IEPA, Division of Land Pollution Control #24, Attn: Brian Newquist. A copy of the amended report is attached.
  - c. Corrective action completed as of August 3, 1990.

We believe that the corrective actions outlined herein, taken as a result of the inspection by Larry Dutton, IEPA, will be effective and will be sufficient to bring this facility within compliance to the requirements of 35 Ill. Adm. Code Part 722 and Part 728, and 42 USCA 6930, Section 3010(a).

If there are any further questions which you may have concerning the compliance of this facility, please contact Bob Seibert at 309-345-5577.

Sincerely,

  
Robert Seibert  
Customer Relations Manager

cc: E. William Radlinski, Mgr  
Planning and Reporting Section  
Division of Land Pollution Control

Mark Dutell, Plant Mgr  
Herb Gray, Qlty Ctr Mgr  
Larry Anderson, Haz Com  
Ernie Karger, PEPP



217/782-6761

Refer to: 0950105001 -- Knox County  
The Gates Rubber Co.  
ILD005230370  
Compliance File

COMPLIANCE INQUIRY LETTER

Certified #P 562 339 247

July 30, 1990

The Gates Rubber Company  
Attn: Bob Siebert  
P.O. Box 1196, Knoxville Road  
Galesburg, Illinois 61402-1196

Dear Mr. Siebert:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 722 and Part 728 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance in Attachment A are based on an inspection completed on June 13, 1990. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Linda Hollinshead  
Compliance Unit  
Planning and Reporting Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.



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If you have any questions regarding the above, please contact Larry Dutton at 309/693-5462.

Sincerely,

*Bill Radlinski*  
by BW

E. William Radlinski, Manager  
Planning and Reporting Section  
Division of Land Pollution Control

EWRLD:LHH:rmi/2653n/46-47

cc: Division File  
Peoria Region  
Larry Dutton  
Linda Hollinshead  
Mark Gurnik



1. Pursuant to 35 Ill. Adm. Code 722.134(d), a generator who generates greater than 100 kilograms but less than 1,000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that:
  1. The quantity of waste accumulated on-site never exceeds 6,000 kilograms;
  2. The generator complies with the requirements of 35 Ill. Adm. Code 725. Subpart I, except the generator need not comply with 35 Ill. Adm. Code 725.276;
  3. The generator complies with the requirements of 35 Ill. Adm. Code 725.301;
  4. The generator complies with the requirements of subsections (a)(2) and (a)(3) and the requirements of 35 Ill. Adm. Code 725. Subpart C.

You are in apparent violation of 35 Ill. Adm. Code 722.134(d) for the following reason(s): The facility did not comply with 35 Ill. Adm. Code 725.273(a) (Subpart I) by not closing (covering) the cooling water sludge container. The facility did not comply with 722.134(a)(3) because the cooling water sludge container was not labeled as hazardous waste.

The Following deficiency was noted:

Pursuant to 42 USCA 6930, Section 3010(a) any person generating or transporting hazardous waste or owning or operating a facility for treatment, storage, or disposal of hazardous waste shall file with the Administrator (or with States having authorized hazardous waste permit programs under Section 3006) a notification stating the location and general description of such activity and the identified or listed hazardous waste handled by such person. The Agency requires that an amended notification be submitted when a new waste stream is generated other than that which has been previously reported on the notification.

You are in apparent violation of Section 3010(a) for the following reason: You failed to submit an amended notification as required by the above section to include the generation of F001, F003, and F005 wastes.

**FACILITY NOTIFICATION  
(8700-12)  
AMENDMENT OR WITHDRAWAL REQUEST FORM**

Complete and Return to:

Illinois Environmental Protection Agency  
Attn: Brian Newquist  
Division of Land Pollution Control #24  
Compliance Monitoring Section  
2200 Churchill Road  
Springfield, IL 62706

Date: 06/13/90

Facility Name: Gates Rubber Co The  
(As it appears on the Federal Printout or on the Acknowledgement Letter)

Federal ID Number: ILD005230370

State ID Number: 0950105001

Location of Facility: PO Box 1196 Knoxville Rd  
(Street Address)

Galesburg 61401 Knox  
(City) (Zip Code) County

Contact Person & Phone #: Bob Seibert (309) 343-7171  
(Name and Title) (Phone Number)

**FOR IEPA USE ONLY**

According to our records, a representative of your facility previously notified the USEPA/IEPA of the following hazardous waste activity(s).

Generator ☒ Treatment/Storage/Disposal \_\_\_\_\_ Transporter \_\_\_\_\_  
(No Part A Submitted)

This notification indicated the following hazardous waste was being handled.

Dool

(List the 4 digit EPA Hazardous Waste Number as indicated on the 8700-12)

6/13/90 Larry Dutton 6/13/90  
Date of Inspection Inspector Date

However, the current status of this facility is:

- ☐ 1. Non-handler.
- ☒ 2. Small Quantity Generator (100 - 1000 kg per month).
- ☐ 3. Facility could not be located.
- ☐ 4. RCRA exempt hazardous waste handler (other than recycler).
- ☐ 5. RCRA exempt recycler.
- ☐ 6. Notified as TSD (No Part A); regulated as Generator.
- ☐ 7. Non-handler (retaining ID # for possible future use or needs ID # to have waste accepted by transporter).
- ☐ 8. Generator of less than 100 kg per month.
- ☐ 9. Non-TSD facility (Closed Gen./Trans.).

Comments: additional waste streams:

D008 F001 F003 F005

(Describe reason(s) for claiming non-regulated status, exemption being claimed, quantities, names and disposition of waste, etc.)

Include copies of any supportive documents (i.e., waste analysis, notifications, manifest copies).

Therefore, please (circle one) withdraw or amend the status of the notification form(s) to reflect the current status above.

Should you have any questions, please contact \_\_\_\_\_  
(Name and Title)  
\_\_\_\_\_ at \_\_\_\_\_  
(Telephone Number)

I am also aware that, should our facility handle hazardous waste in the future, our facility would be required to comply with the applicable notification and permitting requirements.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



MARK DUTELL, PLANT MANAGER

AUG 3, 1990

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(Signature of Owner/Operator or Authorized Representative - Date)

BB:tk:3/1/40(8/5/86)